



LG Electronics U.S.A., Inc.

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Via E-Mail

Ms. Abigail Daken,
Manager
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Re: LG Electronics USA, Inc.'s Comment for ENERGY STAR Residential Air Source Heat Pump (ASHP) and Central Air Conditioner (CAC) Equipment Version 6.0 Draft 1

Dear Ms. Abigail Daken:

Thank you for giving us the opportunity to comment on the ENERGY STAR Residential Air Source Heat Pump and Central Air Conditioner Equipment Version 6.0 Draft1.

LG Electronics USA, Inc., based in Englewood Cliffs, N.J., is the North American subsidiary of LG Electronics, Inc., a \$55 billion global innovator in technology and manufacturing. In the United States, LG sells a wide range of innovative home appliances, home entertainment products, mobile phones, commercial displays, air conditioning systems, solar energy solutions and vehicle components. The "Life's Good" marketing theme encompasses how LG is dedicated to people's happiness by exceeding expectations today and tomorrow. LG is a 2019 ENERGY STAR® Partner of the Year-Sustained Excellence. www.LG.com.

Here at LG Electronics USA, we highly appreciate EPA's continuous efforts in creating and bringing value to businesses and consumers. The ENERGY STAR program has always been a high priority to our business here in the US and we are always open to discuss your concerns and questions.

The following are LG's comments on the ENERGY STAR Residential Air Source Heat Pump and Central Air Conditioner Equipment Version 6.0 Draft1:

1. Support increasing SEER to 16

Based on EPA's research, EPA has proposed to increase the energy efficiency criteria of 15 SEER to 16 SEER for CAC Split Systems and CAC Single Package Equipment. LG agrees to this new requirement of increasing SEER to 16.

2. Burden for Using Two Different Test Procedures

LG opposes the proposal to add the cold climate performance as a percentage of heating capacity at 5°F. A proposal requiring that the capacity of a given unit as measured under the conditions defined by Appendix M1 at 5°F. Also, the Appendix M1 is not currently referenced by DOE. It will take more time to test with these two different test procedures in order to meet the new criteria after internal review. Therefore, this causes significant test burden on manufacturers and certification bodies so LG cannot support this proposal.

Thank you for considering LG's comments for ENERGY STAR Residential Air Source Heat Pump and Central Air Conditioner Equipment Version 6.0 Draft1. We would be glad to further discuss this matter or provide further detail should you so request.

Respectfully Submitted,



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